

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BRITISH TELECOMMUNICATIONS PLC
and BT AMERICAS, INC.,

Plaintiffs,

v.

PALO ALTO NETWORKS, INC.,

Defendant,

C.A. No. 22-cv-1538-CJB

JURY TRIAL DEMANDED

FILED UNDER SEAL

**DECLARATION OF BRIAN E. FARNAN IN SUPPORT OF DEFENDANT
PALO ALTO NETWORKS, INC.'S BRIEF IN SUPPORT OF ITS
MOTION TO STAY PENDING *INTER PARTES* REVIEW**

1. I, Brian E. Farnan, hereby declare as follows:
2. I am an attorney at law with FARNAN LLP, counsel of record for Defendant Palo Alto Networks, Inc. ("Palo Alto Networks") in the above-captioned matter. I submit this declaration based on personal knowledge and following a reasonable investigation. If called upon as a witness, I could competently testify to the truth of each statement herein.
3. Attached hereto as Exhibit 1 is a true and correct copy of the Patent Trial and Appeal Board's Decision Granting Institution of *Inter Partes* Review of U.S. Patent No. 7,895,641, dated November 17, 2023.
4. Attached hereto as Exhibit 2 is a true and correct copy of the Patent Trial and Appeal Board's Decision Denying Institution of *Inter Partes* Review of U.S. Patent No. 7,159,237, dated November 17, 2023.
5. Attached hereto as Exhibit 3 is a true and correct copy of an excerpted portion of Plaintiffs' Objections and Responses to Defendant's First Set of Interrogatories (Nos. 1-11).

6. Attached hereto as Exhibit 4 is a true and correct copy of Palo Alto Networks Inc.'s "End-of-Life Summary," available at

<https://www.paloaltonetworks.com/services/support/end-of-life-announcements/end-of-life-summary> (last accessed November 30, 2023).

7. Attached hereto as Exhibit 5 is a true and correct copy of Plaintiffs' Initial Infringement Contentions.

8. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiffs' Amended Identification of Accused Products Pursuant to Paragraph 4(a) of the Default Standard for Discovery.

9. Attached hereto as Exhibit 7 is a true and correct copy of Defendant's Claim Comparisons Between U.S. Patent No. 7,159,237 and U.S. Patent No. 7,895,641.

10. Attached hereto as Exhibit 8 is a true and correct copy of an excerpted portion of Exhibit A to Plaintiffs' Preliminary Infringement Contentions.

11. Attached hereto as Exhibit 9 is a true and correct copy of a document titled "PTAB Trial Statistics FY23 Q3 Outcome Roundup IPR, PGR," available at https://www.uspto.gov/sites/default/files/documents/ptab_aia_fy2023_q3__roundup.pdf (last accessed November 30, 2023).

I declare under penalty of perjury that the foregoing statements made by me are true and correct.

Dated: December 4, 2023

/s/ Brian E. Farnan

Brian E. Farnan

Attorney for Palo Alto Networks, Inc.